

PSD/NSR Minor Source Interface Rule Draft Walkthrough

NSR Retooling Team

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Wisconsin Department of Natural Resources

Attack Interface by Program

- Clean Units
- Pollution Control Projects
- Plant-wide Applicability Limits
- Applicability Test

Clean Units

- Exempt from minor NSR if:
 - Modeling does not show violation of air standard or increment
 - Does not trigger a requirement under 111 or 112
- Modification, if not exempt under 406.04(4) makes unit modified under other regulations
- Documented using minor revision process
- \$2,700 for comparable to BACT/LAER
- \$700 if modeling required
- No fee for BACT/LAER Clean Unit Status

Pollution Control Projects

- Exempt from minor NSR if:
 - Modeling does not show violation of air standard or increment
 - Does not trigger a requirement under 111 or 112
 - The project is listed in 405.02(24m)(a) to (f)
- Modification does not make unit modified under other regulations
- Unless not otherwise exempt under NR 406, documented using minor revision process
- \$2,300 for review on unlisted projects
- \$700 if modeling required

Plant-wide Applicability Limits

- Modifications under PAL exempt from minor NSR if:
 - Modeling does not show violation of air standard or increment
 - Does not trigger a requirement under 111 or 112
 - Modification is not significant new or replacement unit
- Modification, if not exempt under 406.04(4) makes unit modified under other regulations
- Documented using minor revision process if:
 - Change to existing equipment insignificant otherwise significant revision
 - New or replacement unit insignificant, else minor NSR applies unless otherwise exempt, then significant

Fees for PALs

■ Establishment of PAL

- \$10,150 attainment area

 - (\$8,000 base + \$2,150 synthetic minor condition)

- \$12,850 nonattainment area, PAL for NAA pol

 - (\$8,000 base + \$2,150 syn min + \$2,700 BACT)

■ \$2,300 modifications reviewed under 406

■ \$1,100 those modifications exempt from 406 but are not minor revisions

■ \$700 modeling, if applicable

Applicability Test

- Exempt from minor NSR if:
 - Modeling does not show violation of air standard or increment
 - Does not trigger a requirement under 111 or 112
- Modification, if not exempt under 406.04(4) makes unit modified under other regulations
- Documented using minor revision process
- \$2,300 for exemption determination

Fee Comparison in Region 5

- All States in Region 5 agree that fees are necessary to support NSR reform work
- All States in Region 5 using structure of existing NSR program funding to base fee
- However, Region consists of many different fruits, thus apple to apple comparison difficult

Delegated States

■ Minnesota

- NSR funded through emissions fees and grants
- No cap on emission fees
- Found that PAL is highly resource intensive

■ Michigan

- NSR funded through emissions fees, grants and other general purpose revenue
- Believe additional fees would be necessary but wrong time to ask for fees to cover exemptions
- Limited experience, but fund as mentioned

■ Illinois

- Just received authorization to fund NSR using program revenue
- Will use to fund exemptions
- Currently using emission fees, grants and general purpose revenue

SIP States

■ Ohio

- Just beginning work on NSR rule
- Expect to fund using existing NSR fee structure
- NSR supported by program revenue

SIP States - 2

■ Indiana

- Seeking adoption of NSR changes in June
- Rule includes fees for NSR reform tools
- Clean Units
 - \$3,000 2-5 Units
 - \$6,000 6-10
 - \$10,000 10+
- PALs
 - \$40 per ton up to \$40,000, per pollutant
- Modeling - \$700
- Listed PCPs - no charge, Unlisted - NSR fee